

MILMAN LABUDA LAW GROUP PLLC
3000 MARCUS AVENUE
SUITE 3W8
LAKE SUCCESS, NY 11042

TELEPHONE (516) 328-8899
FACSIMILE (516) 328-0082

September 23, 2021

VIA ECF

United States District Court
Southern District of New York
Attn: Hon. Victor Marrero, U.S.D.J.
500 Pearl Street, Courtroom 15B
New York, NY 10007-1312

Re: Rosenfield & Co., PLLC v. Trachtenberg, Rodes & Friedberg LLP, et al.
Case No.: 1:21-cv-3858 (VM) (KHP)

Dear Judge Marrero:

This firm represents all of the Defendants in the above-referenced case with the exception of Trachtenberg, Rodes & Friedberg LLP (hereinafter the “Star Defendants”). The Star Defendants write to respectfully request a two (2) week extension of time – until October 8, 2021 – to amend their Answer with Counterclaims, Cross-Claims, and Third-Party Complaint (hereinafter referred to as the “Amended Answer”).

Consistent with ¶ II(B)(1) of this Court’s Individual Practices (hereinafter “Practices”), the Star Defendants’ deadline to file the Amended Answer falls on Friday, September 24, 2021. The Star Defendants seek an extension of time due to scheduling issues surrounding the Jewish holidays and deadlines in other matters. In support of and consistent with ¶ I(F) of the Practices, the Star Defendants represent that: (i) this letter motion is timely submitted; (ii) there have been no previous requests for an extension of time to file an Amended Answer; (iii) Plaintiff does not object to the requested extension; and (iv) they are unaware of any scheduled dates that would be affected by the requested extension. Accordingly, the Star Defendants respectfully submit that good cause exists for granting the requested extension of time. See Fed. R. Civ. P. 6(b)(1)(A). The Star Defendants thank this honorable Court for its time and attention to this case.

Dated: Lake Success, New York
September 23, 2021

Respectfully submitted,

MILMAN LABUDA LAW GROUP PLLC

/s

Emanuel Kataev, Esq.
3000 Marcus Avenue, Suite 3W8
Lake Success, NY 11042-1073
(516) 328-8899 (office)
(516) 303-1395 (direct dial)
(516) 328-0082 (facsimile)
emanuel@mllaborlaw.com

via ECF (all parties of record).